

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DAWN MELISSA DAIGRE

PLAINTIFF

VS.

CIVIL ACTION NO.: 1:10-cv-00568(LG)(RHW)

**CITY OF WAVELAND, MISSISSIPPI, A
MUNICIPAL CORPORATION, CHIEF JAMES
A. VARNELL, OFFICER HENRY BOUGANIM,
SERGEANT CLAY NECAISE, OFFICER
CHRISTOPHER ALLEN, AND OFFICER
JOSHUA POYADOU, INDIVIDUALLY AND IN
THEIR OFFICIAL CAPACITIES AS POLICE
OFFICERS WITH THE CITY OF
WAVELAND, MISSISSIPPI**

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF DEADLINES

The Defendants, the City of Waveland, Mississippi, James A. Varnell, Henry Bouganim, Clay Necaise, Christopher Allen and Joshua Poyadou (collectively, the “Municipal Defendants”), by and through their undersigned counsel, submit this Unopposed Motion for an Extension of Deadlines. In support of said Motion, Defendant would show as follow:

1. Pursuant to this Court’s scheduling order, the current deadline for the completion of discovery is September 1, 2011 and the deadline for submission of motions is September 15, 2011. Counsel for the parties have conferred and agree that, due to prior obligations of the attorneys and the parties, it will not be possible to meet the deadlines.

2. Defendants therefore request an extension of the discovery and motions deadlines. Defendants request that the discovery deadline be extended up to and including September 29, 2011 and that the deadline for filing of motions be extended up to and including October 13, 2011. These requested dates would put the motions deadline more than 120 days prior to the scheduled pretrial conference date of February 22, 2012.

3. Plaintiff's attorney has been contacted and consents to the requested extensions. This motion is not being made for purposes of harassment or delay, but to allow the parties adequate time to complete discovery.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that this Court grant their Motion for Extension of Deadlines and enter an order (1) extending the deadline for completion of discovery up to and including September 29, 2011; and (2) extending the deadline for the filing of motions up to and including October 13, 2011.

THIS, the 8th day of August, 2011.

Respectfully submitted,

PHELPS DUNBAR, LLP

BY: /s/W. Brett Harvey

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**ATTORNEYS FOR MUNICIPAL
DEFENDANTS**

CERTIFICATE OF SERVICE

I, W. BRETT HARVEY, do hereby certify that I have this date electronically filed the foregoing *MOTION* with the Clerk of the Court via ECF, which forwarded notice of the same via email to the following counsel:

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ATTORNEYS FOR PLAINTIFF

THIS, the 8th day of August, 2011.

/s/W. Brett Harvey
W. BRETT HARVEY